

Mr. Michael Stewart  
Engineering Associate  
KDHE/BAR  
Forbes Field, Building 283  
Topeka, KS 66620-0001

Dear Mr. Stewart:

The following comments are in regard to the first draft revision of the proposed Class 1 Title V operating permit for Coastal Field Services Company (formerly Colorado Interstate Gas Company) - Hugoton #5 Compressor Station located in Hamilton County, Kansas (source ID no. 0750009). The draft revisions were received electronically by EPA on Monday, July 27, 1998, following a conference call with KDHE permitting staff on Wednesday, July 22, 1998. Three files were received by EPA: the revised draft permit, additional changes and a letter to Coastal Field Services.

Overall, EPA and KDHE came to agreement on virtually all of the items discussed on the conference call. Most of the following comments are minor or merely suggestions.

- 1) All of the "additional changes" are agreeable.
- 2) FYI - In the letter to Coastal, EPA would again refer to comment number 5 in the original comments from EPA about permit shields. Kansas does have the authority to provide a shield for non-applicable requirements if they so choose pursuant to §70.6 (f)(1)(ii). Alternatively, they can be listed in the statement of basis.
- 3) On pages 4, 5 and 6 when you refer to Part 61, Subparts M and A, you have combined them together as one requirement. Actually, EPA feels that the way they were stated in the original proposal is better.
- 4) On page 8, under "opacity compliance demo", you mentioned possibly using your "normal" four tier approach for opacity and adding a paragraph at the end to address emissions which are very low or non-existent. What is said in this section is already stated in table A on page 5. The "normal" approach is not critical for this permit but it sounds good for future ones.

5) Be advised that the section on "temporary replacement of IC engines" may need to be altered somewhat if the source has agricultural-related activities, as mentioned in K.A.R. 28-19-300(a)(1)(A).

Also, you added the 40 CFR 52.21(b)(i) cite in parts a and b. Should this be 40 CFR 52.21 (b)(**23**)(i)?

In section a, part i... would you want some type of notification or records kept to keep track of replacements? The other parts require approval or a permit from KDHE before construction, so you at least know what they are doing.

6) Under permit shield, page 8, is the phrase "as of the date of issuance" supposed to be at the end of sentence? The phrase is already used earlier.

7) On page 11, number 3, you refer to the 12/3/93 Federal Register. That schedule has been revised several times in the FR...on 4 June 96 and on 12 February 98. Should these revisions be mentioned also?

8) On page 11, number 4, "permit term and renewal", some suggested language changes are 1) in the second sentence, use "for renewal of the current permit" instead of just "for renewal." 2) in the last sentence, use "application for renewal" instead of just "application." 3) Replace references to "the Department" with "BAR" or "KDHE."

9) The addresses of KDHE and EPA on form CR-02 (annual certification) could be changed to be the same as those in the section on "submissions."

10) In the future, EPA will not request copies (during our comment period) of any other comments received by KDHE. We may inquire, in general, as to whether any other comments were received.

11) Please reflect any permit changes, if necessary, in the statement of basis.

12) KDHE has "credible evidence" language in their SIP at K.A.R. 28-19-212(a). You may want to consider referencing this regulation in the permit. It could be included in the General Provisions section. We are being told by HQ that CE language should be in Title V permits.

This is the formal EPA comment letter on the **revised** proposed Title V permit for this source which was received electronically by EPA on July 27, 1998. The comments on this revision were faxed to KDHE on July 31, 1998, in the interest of saving time. The comments in both communications are the same.

If there are any questions or if you wish to discuss any of these comments, please contact Gary Schlicht at (913) 551-7097.

Sincerely,

Donald C. Toensing  
Chief  
Air Permitting & Compliance Branch